

**Commonwealth of Kentucky
Division for Air Quality**

PERMIT STATEMENT OF BASIS

CONDITIONAL MAJOR, SYNTHETIC MINOR DRAFT PERMIT F-06-042 R1

NATIONAL OFFICE FURNITURE (NOF) – DANVILLE

STEWARTS LANE, INDUSTRIAL PARK, DANVILLE, KY 40422

JUNE 15, 2007

REVIEWER: IBRAHIM AL-BURAI

PLANT I.D. #: 21-021-00021

A.I.#: 371

ACTIVITY #: APE20070001

SOURCE DESCRIPTION:

National Office Furniture (NOF) – Danville manufactures upholstered furniture. Existing equipment at the site includes four paint booths, a natural gas-fired drying oven, and a woodworking operation consisting of many different types of planers, saws, sanders, routers and other miscellaneous types of equipment.

Revision 1

On April 26, 2007, the company submitted an application for a name change. Permit F-06-042 was revised to reflect the name change request per Regulation 401 KAR 52:030, Section 13 (Administrative Permit Amendment).

Renewal Permit

The source has submitted an air permit change name application. It currently holds a Conditional Major permit, F-06-042. There have been no changes in the plant operations since the latest permit revision, F-06-042. The PTE of VOC is over 250 tons per year and PTE of both single and combined HAP(s) are over the major source thresholds. However, the source has accepted emission limits pertaining to the HAP and VOC, which allowed it to be a Conditional Major / Synthetic Minor Source. These limits are 90, 9.0 and 22.5 for VOC, single HAP and combined HAPs, respectively.

Type of control and efficiency

There is a bag house with 99% control efficiency for the PM emissions from the woodworking operations. The spray paint booths # 2-5 use exhaust filters that control PM emissions with 90% efficiency. The spray painting and adhesive operations are assumed to have 60% transfer efficiency. There are no VOC control devices associated with the paint booths.

Emission factors and their source

MSDS

Engineering calculations

AP-42

Applicable Regulations

401 KAR 61:020, Existing process operations, is applicable to each affected facility or source, associated with process operations, which are not subject to another emission standard with respect to particulate matter emissions commenced before July 2, 1975.

401 KAR 59:010, New process operations, is applicable to each affected facility or source, associated with process operations, which are not subject to another emission standard with respect to particulate matter emissions commenced after July 2, 1975.

Note: 401 KAR 59:010 is applicable to paint booths #1 - 5 since these affected facilities were modified in 1991.

EMISSION AND OPERATING CAPS DESCRIPTION:**401 KAR 61:020**

1. Visible emissions shall not equal or exceed 40% opacity for each applicable process.
2. Particulate matter emissions shall not exceed 3.50 pounds/hour for each applicable process.

401 KAR 59:010

3. Visible emissions shall not equal or exceed 20% opacity for each applicable process.
4. Particulate matter emissions shall not exceed 2.34 pounds/hour for each applicable process.

Conditional Major Limitations

VOC emissions shall not exceed 90 tons during any consecutive twelve (12) month period.

The emissions of any individual Hazardous Air Pollutant (HAP) shall not exceed nine (9) tons during any consecutive twelve (12) month period. The emissions of combined HAP shall not exceed 22.5 tons per year.

PERIODIC MONITORING

- (a) The permittee shall inspect the baghouse on a daily basis. Baghouse shall be replaced when determined to be ineffective (through visual inspection).
- (b) The permittee shall inspect the filters on a daily basis. Filters shall be replaced when determined to be ineffective (through visual inspection).
- (c) The permittee shall monitor the source-wide VOC and HAP usage on a monthly and rolling 12-month basis.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.